

Cirrinity - powered by Wittenberg Telephone
2628 Highway 45, Antigo, WI 54409



RE: GN Docket No. 17-258

Dear FCC Commissioners,

Cirrinity Wireless, LLC is a Wireless and Fiber company that connects about 1,000 rural and underserved customers in Central Wisconsin, primarily in the county of Langlade. As a company we have been very progressive at filling the internet void in our area. In the past two years we have been awarded in total 3 of the 5 state grants that we have applied for. Our track record has shown that we deliver the intended services in a timelier manner than most other ISPs could achieve.

As a Wireless Internet Service Provider one of the constant battles that arises is the ability to achieve cleaner spectrum that can deliver good services to the end customer. We also hold ourselves accountable, keeping up with 25M/4M internet service requirements that the FCC has put into place. Here in North Central Wisconsin one of the constant battles is the trees and terrain. Due to this, a good portion of our network is utilizing the 2.4GHz unlicensed band to push connections to areas that desperately need it. However, due to the nature and limitations of 2.4 unlicensed spectrum, there are downsides primarily with noise.

So, now we are looking to CBRS to help us provide a cleaner, better and faster connection to the end user. We have invested heavily in the past year and a half on testing and implementing equipment with the intention to utilize the CBRS Spectrum with PAL licenses. These areas include current and new customers that were previously unable to achieve the standard of 25M/4M. In addition, one of those areas we have chosen to deploy in CBRS was a key point in one of our awarded grants.

Current proposed changes to the CBRS spectrum will most definitely hinder our plans to obtain PALs if it is changed from Census tract to PEA. Since our county touches two of the bordering PEA areas, we would be forced to attempt to obtain PALs that cover most of the northern Wisconsin and parts of Northern Michigan. This will most likely not be economically feasible to do. Additionally, this would be a waste as this would include areas that other WISPs or private industries could benefit in clean unused spectrum.

Cirrinity Wireless urges the commission to keep the original CBRS 2015 rules in place so small businesses like ours can prosper and provide a better experience to the end user. This was in fact named the Citizens Broadband Radio Service after all, and all operators and citizens should be able to benefit from it.

Adam Igl

Wireless Manager